

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON; STATE OF
ARIZONA; STATE OF ILLINOIS; and
STATE OF OREGON,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity
as President of the United States; U.S.
DEPARTMENT OF HOMELAND
SECURITY; BENJAMINE HUFFMAN, in
his official capacity as Acting Secretary of
Homeland Security; U.S. SOCIAL
SECURITY ADMINISTRATION;
MICHELLE KING, in her official capacity
as Acting Commissioner of the Social
Security Administration; U.S.
DEPARTMENT OF STATE; MARCO
RUBIO, in his official capacity as Secretary
of State; U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
DOROTHY FINK, in her official capacity
as Acting Secretary of Health and Human
Services; U.S. DEPARTMENT OF
JUSTICE; JAMES MCHENRY, in his
official capacity as Acting Attorney
General; U.S. DEPARTMENT OF
AGRICULTURE; GARY WASHINGTON,
in his official capacity as Acting Secretary
of Agriculture; and the UNITED STATES
OF AMERICA,

Defendants.

NO. 2:25-cv-00127

DECLARATION OF
KRYSTAL COLBURN

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I, Krystal Colburn, hereby declare:

1. I am the Chief Reporting Officer and Assistant State Registrar of the Arizona Department of Health Services (“ADHS”), a position I have held since 2023. As Chief Reporting Officer and Assistant State Registrar, I provide overall leadership, management and direction to the Bureau of Vital Records (BVR), Cancer and Birth Defects Registries and the Office of Auditing. Prior to holding this position, I served as Section Chief and Assistant State Registrar for the BVR. I have been employed by the ADHS since 2007.
2. As Chief Reporting Officer and Assistant State Registrar, I have personal knowledge of the matters set forth below, or have knowledge of the matters based on my review of information and records gathered by my staff.

Arizona Department of Health Services

3. ADHS’s mission is to promote, protect, and improve the health and wellness of individuals and communities in Arizona. To support that goal, ADHS performs many functions, including overseeing the BVR, which register vital events such as births. BVR’s functions date back to the late 1800s and have been statutorily required since the early 1900s. Many state and federal agencies use birth certificates to determine eligibility for various programs, including but not limited to the issuance of driver licenses and U.S. passports.

Registration and Birth Certificates of Newborns

4. Healthcare facilities coordinate with BVR to collect information to register a child’s birth.
5. When a child is born in a healthcare facility, a medical attendant to the birth is statutorily obligated to register the birth. They provide the newborn’s parents with a Certificate of Live Birth Worksheet that asks for several pieces of information, including the parents’ place of

birth and Social Security Numbers (SSNs). The Worksheet does not inquire about the parents' immigration status.

6. If the parents do not have an SSN, or do not wish to share it, they can leave that field blank or select none or unknown. Their omission of that information does not affect the newborn's ability to obtain a birth certificate. If parents do provide their SSNs, that information is stored only for child support enforcement purposes and is not used to verify their immigration status.
7. After the newborn's parents complete and sign the Worksheet, hospital staff enter the information from the Worksheet into an electronic birth registration system maintained by BVR. BVR then creates and registers the birth certificate with the State.
8. A newborn's completed birth certificate does not indicate whether the parents have an SSN. The only information on the parents is the mother's legal name, the father's full name (if provided), their places and dates of birth, and address. Currently, it is not possible to determine a foreign-born parent's immigration status from their child's birth certificate.

Application for Social Security Number of Newborns

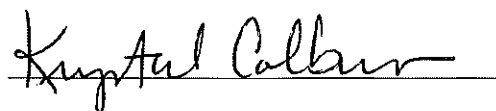
9. While completing the Certificate of Live Birth Worksheet to register a newborn for a birth certificate at a healthcare facility, parents may also request an SSN for the newborn through a Social Security Administration (SSA) program called Enumeration at Birth (EAB).
10. The EAB process is voluntary for families, but according to SSA, about 99% of SSNs for infants are assigned through this program.
11. After a healthcare facility receives a completed Certificate of Live Birth Worksheet, it submits electronically the information from the worksheet and a request for an SSN to BVR,

which then transmits that information and request to SSA. BVR only sends EAB records to SSA for enumeration of infants born within the past 12 months.

12. Arizona receives federal funding from the SSA for each SSN that is issued through the EAB process. The SSA has paid the State of Arizona \$874,560.08 for FY 2024, \$936,469.38 for FY 2025, and it is projected to pay \$1,002,389.94 in FY 2026.
13. If birthright citizenship were revoked pursuant to the Executive Order, certain children born in the United States would no longer be considered citizens and would therefore be ineligible for an SSN.
14. If the number of births in Arizona stays constant or increases, but fewer of those children are considered citizens eligible for SSNs, then there will be fewer SSNs issued.
15. If fewer SSNs were issued through the EAB process due to the revocation of birthright citizenship, then this will result in reduced EAB funding to Arizona, perhaps a significant reduction.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 21 day of January, 2025, in Phoenix, Arizona.



Krystal Colburn

Chief Reporting Officer and Assistant State
Registrar
Arizona Department of Health Services